## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

MICHAL KONOPKA and DRAGAN BOSOTINA, and on behalf: of themselves and all others similarly situated, PLUMBERS: UNION LOCAL NO. 1 OF THE UNITED ASSOCIATION OF: JOURNEYMEN AND APPRENTICES OF THE PLUMBING: AND FITTING INDUSTRY OF THE UNITED STATES AND: CANADA, TRUSTEES OF THE PLUMBERS LOCAL UNION: NO. 1 WELFARE FUND, TRADE EDUCATION FUND, and: 401(k) SAVINGS PLAN, TRUSTEES OF THE UNITED: ASSOCIATION NATIONAL PENSION FUND, and: TRUSTEES OF THE INTERNATIONAL TRAINING FUND,:

No.: 25 Civ. 811 (RER)(CLP)

REQUEST FOR CERTIFICATE OF DEFAULT

Plaintiffs,

- against -

PACE PLUMBING CORP., PACE PLUMBING DELAWARE CORP., THE PACE COMPANIES NEW YORK, LLC, PACE FIELD SERVICES, LLC d/b/a PACE MECHANICAL, and EAGLESTONE, LLC d/b/a EAGLESTONE NY, LLC, and ATERIAN INVESTMENT MANAGEMENT, LP d/b/a ATERIAN INVESTMENT PARTNERS,

Defendants.

TO: BRENNA B. MAHONEY, Clerk of the Court UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

Please enter the default of Defendants Pace Plumbing Corp., Pace Plumbing Delaware Corp., The Pace Companies New York, LLC, Pace Field Services LLC d/b/a Pace Mechanical, and Eaglestone LLC d/b/a Eaglestone NY, LLC, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for failure to plead or otherwise defend the above-captioned action as fully appears from the court file herein and from the attached Declaration in Support of Request for Certification of Default.

Dated: Melville, New York April 25, 2025

Respectfully submitted,

Document 22

KESSLER MATURA, P.C.

Troy L. Kessler Garrett Kaske 534 Broadhollow Rd, Ste 275 Melville, New York 11747 (631) 499-9100 tkessler@kesslermatura.com gkaske@kesslermatura.com

SUGAR LAW CENTER FOR ECONOMIC &

SOCIAL JUSTICE

John C. Philo\* Anthony D. Paris\* 4605 Cass Ave., 2nd Floor Detroit, Michigan 48201 (313) 993-4505 jphilo@sugarlaw.org tparis@sugarlaw.org

## Attorneys for Plaintiffs Michal Konopka and Dragan Bosotina and the Putative Class

PITTA LLP

Jane Lauer Barker 120 Broadway, 28th Floor New York, NY 10271 (tel.) 212-652-3828 (fax) 212-652-3891 jbarker@pittalaw.com

Attorneys for Plaintiff Plumbers Union Local No. 1 of the United Association of Journeymen and Apprentices of the Plumbing and Fitting Industry of the United States and Canada

VIRGINIA & AMBINDER, LLP Charles R. Virginia, III

<sup>\*</sup>pro hac vice application forthcoming

Adrianna R. Grancio 40 Broad Street, 7th Floor New York, NY 10004 (212) 943-9080 cvirginia@vandallp.com agrancio@vandallp.com

Attorneys for Plaintiff Trustees of the Plumbers Local Union No. 1 Welfare Fund, Trade Education Fund, 401(k) Savings Plan, United Association National Pension Fund, and International Training Fund